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*Counsel for Community Trust Bank, Inc.*

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

<b>IN RE:</b>	)	<b>Chapter 11</b>
	)	
<b>IBCS MINING, INC., et al.,<sup>1</sup></b>	)	<b>Case No. 14-61215</b>
	)	
<b>Debtor.</b>	)	<b>Jointly Administered</b>

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**MOTION FOR ADMISSION PRO HAC VICE OF PATRICIA K. BURGESS**

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Lynn L. Tavenner and Paula S. Beran (together, “Movants”) hereby move the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Patricia K. Burgess (“Mrs. Burgess”) (KY Bar No. 85694), an attorney with the law firm of Frost Brown Todd LLC, in Lexington, Kentucky, to appear pro hac vice in the above styled bankruptcy case before the United States Bankruptcy Court for the Western District of Virginia (the “Bankruptcy Case”) to represent Community Trust Bank, Inc. (“CTB”) and in support of this Motion, the Movants state as follows:

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<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number include: IBCS Mining, Inc. (8425) and IBCS Mining, Inc., Kentucky Division (8711). The location of the Debtors’ service address is 944 Glen Wood Station Lane, Suite 101, Charlottesville, Virginia 22901.

1. Movants are members in good standing of the Bar of the Supreme Court of Virginia and attorneys admitted to practice before the United States Bankruptcy Court for the Western District of Virginia.

2. Mrs. Burgess is a member of good standing of the State Bar of Kentucky and the State Bar of Ohio and is an attorney admitted to practice and a member in good standing of the bar of the following courts: United States Bankruptcy Courts for the Eastern and Western Districts of Kentucky; United States Bankruptcy Courts for the Northern and Southern Districts of Ohio; United States District Courts for the Eastern and Western Districts of Kentucky; United States District Courts for the Northern and Southern Districts of Ohio; and United States Court of Appeals for the Sixth Circuit. There are no disciplinary proceedings pending against Mrs. Burgess in any jurisdiction in which she is admitted to practice.

3. Movants request that this Court authorize Mrs. Burgess to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of CTB.

4. Mrs. Burgess' contact information is as follows: Patricia K. Burgess, KY Bar No. 85694, Frost Brown Todd LLC, 250 West Main Street, Suite 2800, Lexington, Kentucky 40507, phone no. (859) 231-0000, fax no. (859) 231-0011, e-mail [pburgess@fbtlaw.com](mailto:pburgess@fbtlaw.com).

5. Movants and their law firm shall serve as local counsel with Mrs. Burgess in the Bankruptcy Case (and related proceedings).

6. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) to counsel for the Debtor, and (c) all personas receiving electronic notice in the Bankruptcy Case as of the service hereof.

WHEREFORE, Movants respectfully request that this Court enter an Order authorizing Mrs. Burgess to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit A attached hereto and grant such other and further relief as is just.

/s/ Lynn L. Tavenner  
Movant

Lynn L. Tavenner, Esq. (Va. Bar No. 30083)  
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*Counsel for Community Trust Bank, Inc.*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>nd</sup> day of July, 2014, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Patricia K. Burgess was served on all personas receiving electronic notice in these cases, including

Office of the U.S. Trustee  
210 First Street, Suite 505  
Roanoke, VA 24011  
*United States Trustee*

Robert S. Westermann  
Hirschler Fleischer, P.C.  
2100 East Cary Street  
The Edgeworth Building  
Richmond, VA 23223  
-and-  
Rachel A. Greenleaf  
Hirschler Fleischer, PC  
P.O. Box 500  
Richmond, VA 23218-050  
*Counsel for the Debtors*

/s/ Lynn L. Tavenner  
Movant

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*Counsel for Community Trust Bank, Inc.*

**UNITED STATES BANKRUPTCY COURT  
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<b>IN RE:</b>	)	<b>Chapter 11</b>
	)	
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<b>Debtor.</b>	)	<b>Jointly Administered</b>

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**ORDER GRANTING MOTION  
FOR ADMISSION PRO HAC VICE OF PATRICIA K. BURGESS**

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The matter came before the Court upon the Motion for Admission Pro Hac Vice of Patricia K. Burgess (the “Motion”) filed by Lynn L. Tavenner and Paula S. Beran, seeking the admission *pro hac vice* of Patricia K. Burgess of the law firm of Frost Brown Todd LLC, in the above-styled bankruptcy case (the “Bankruptcy Case”) pursuant to local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Patricia K. Burgess be authorized to practice *pro hac vice* before the Court in this Bankruptcy Case, it is hereby

ORDERED as follows:

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<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number include: IBCS Mining, Inc. (8425) and IBCS Mining, Inc., Kentucky Division (8711). The location of the Debtors’ service address is 944 Glen Wood Station Lane, Suite 101, Charlottesville, Virginia 22901.

1. The Motion be and hereby is granted.

2. Patricia K. Burgess of the law firm of Frost Brown Todd LLC, is hereby admitted to appear in this Bankruptcy Case and any related proceedings *pro hac vice* pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of Community Trust Bank, Inc.

ENTERED: July \_\_\_, 2014

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UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Lynn L. Tavenner

Lynn L. Tavenner, Esq. (Va. Bar No. 30083)

Paula S. Beran, Esq. (Va. Bar No. 34679)

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*Counsel for Community Trust Bank, Inc.*